

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

LACI N. BLANCHARD,
INDIVIDUALLY, AND AS NEXT
FRIEND OF W.B., SURVIVING
MINOR CHILD OF RONNIE P.
BLANCHARD, JR. § CIVIL ACTION NO. 4:22-CV-2420

Plaintiff, § JUDGE: GEORGE C. HANKS, JR.

v. §

SANARE ENERGY PARTNERS LLC,
ET AL. § MAGISTRATE JUDGE: ANDREW M.
EDISON

Defendants. §

MOTION FOR COURT TO ENTER STANDARD PROTECTIVE ORDER

To the Honorable George C. Hanks, Jr., U.S. District Judge:

Defendant, Sanare Energy Partners, LLC (“Sanare”) files this agreed motion respectfully requesting this Court enters its standard protective order in these proceedings.

I. Argument

This court may enter protective orders pursuant to Federal Rule of Civil Procedure 26(c) to ensure the confidential information of a party is disclosed only in accordance with this Court's protective order. The parties have conferred in this matter, and all agreed to the form and substance of the Court's standard protective order which is attached to this motion as *Exhibit 1*.

II. Request For Relief

Sanare Energy Partners, LLC respectfully requests the Court grant this Motion as soon as practicable and enter its standard protective order, attached to this motion as *Exhibit 1*. Sanare requests any other, further, or alternative relief to which it is entitled.

Date: August 10, 2023.

Respectfully submitted,

By /s/Aaron E. Koenck
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**ATTORNEYS FOR DEFENDANT
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CERTIFICATE OF CONFERENCE

On July 24, 2023, counsel for Sanare, Aaron E. Koenck, contacted counsel for Plaintiff and All Coast, LLC by email requesting their position on the substance and form of the Standard Protective Order which is attached to this motion as *Exhibit 1*.

Plaintiff's counsel responded on July 27, 2023, by email and stated they agreed to the form and substance of the Standard order and may sign *Exhibit 1* by permission.

Counsel for All Coast, LLC responded on July 28, 2023, by email and stated they agreed to the relief sought in this motion by email and stated they agreed to the form and substance of the Standard order and may sign *Exhibit 1* by permission.

/s/ Aaron E. Koenck

Aaron E. Koenck

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing has been served on all counsel of record via U.S. Mail, return receipt requested, or through the Clerk of this Court on August 10, 2023.

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